

**BEFORE THE  
PUBLIC SERVICE COMMISSION OF WISCONSIN**

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Application of Wisconsin Electric Power Company, as an Electric  
Public Utility, for Approval to Implement a Solar Now Pilot  
Tariff and a Dedicated Renewable Energy Resource Pilot Tariff

Docket No. 6630-TE-102

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**REQUEST TO INTERVENE AND NOTICE OF APPEARANCE  
OF THE CITIZENS UTILITY BOARD**

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Pursuant to Wis. Admin. Code § PSC 2.21, the Citizens Utility Board (CUB) hereby files this request to intervene in the above-captioned proceeding. CUB's attorney also files a Notice of Appearance. CUB further respectfully requests to be granted intervention within five days, if no objection to this request has been received in that time.

**I. STATEMENT OF INTEREST IN THE PROCEEDING.**

CUB has approximately 2,000 members, primarily citizens of Wisconsin. CUB was originally created by the Wisconsin legislature under Chapter 72, Laws of 1979, to advocate on behalf of residential and other customers on utility issues. CUB subsequently reorganized and is currently a nonstock, nonprofit corporation organized and existing under Wis. Stat. ch. 181.

CUB's purpose, as stated in its bylaws, is to:

1) provide public interest legal services to ensure effective and democratic representation of residential, farm and small business utility customers before regulatory agencies and the courts; 2) advocate for reliable, affordable, and sound utility service; 3) educate consumers on utility service through the preparation, compilation, analysis, and dissemination of information and resource materials relating to utility regulation and public energy and telecommunications policy, and generally engage in and support public education regarding utility regulation and public energy and telecommunications policy.

CUB Bylaws, Article III.

CUB intends that its advocacy benefit not just its own members but all residential and small business ratepayers of the state.

CUB's members include residential and small business customers of Wisconsin Electric Power Company (WEPCO). CUB and its members have a substantial interest that will be affected by a decision in this proceeding. (Wis. Admin. Code § PSC 2.21(1)) CUB's members pay for electrical service from WEPCO, and the utility's application to implement solar and renewable energy tariff programs may impact non-participating ratepayers, in addition to impacting the customers who choose to participate in these programs. CUB intends to examine the programs' potential costs and benefits for both participating and non-participating customers. CUB has an interest in this docket in that the rates its members pay may be affected by the Commission's actions regarding WEPCO's application, and through its participation, CUB will help ensure that the structures of the tariffs are equitable for all WEPCO customers.

Alternatively, CUB should be granted permissive intervention in this proceeding. CUB's advocacy on behalf of residential and small business ratepayers will promote the proper disposition of the issues to be determined. No schedule has been set in this case, and CUB will work within all deadlines set to not impede the timely completion of this docket. Thus, CUB should be granted intervention under Wis. Admin. Code § PSC 2.21(2).

In addition to the above reasons, CUB should also be allowed to participate in this matter on the basis of its purpose and historic origin. In 1979, the Legislature created CUB to, among other things, represent the rights of residential ratepayers at hearings before administrative agencies. *See* Wis. Stat. § 199.02. Although CUB is currently incorporated as a nonstock, nonprofit corporation, its purpose remains the same and, more importantly, has been found to alone create standing for CUB in proceedings such as the one at bar. *See Application of the*

*Wisconsin Power and Light Company, as an Electric, Water and Natural Gas Public Utility, to Change Electric, Water and Natural Gas Rates, Docket No. 6680-UR-112, Motion Hearing of September 25, 2002, Tr. at 3-6.*

## **II. NOTICE OF APPEARANCE.**

Kate Hanson will serve as the attorney for CUB in this case. All further documents and correspondence should be served on:

Tom Content: content@cubwi.org  
Kate Hanson: hanson@cubwi.org  
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## **III. CONCLUSION.**

For the aforementioned reasons, CUB respectfully requests that the Commission expeditiously grant its request to intervene in the above-captioned proceeding.

Dated this 6th day of November, 2018.

Respectfully submitted,

*/s/ Katherine Hanson*

By: \_\_\_\_\_

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